

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

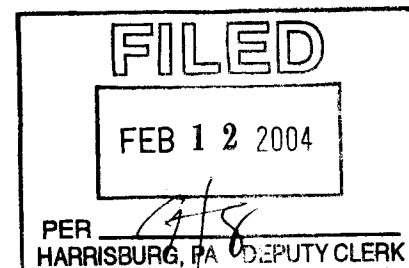
YORK COUNTY POLICE DEPARTMENT,
JAMES H. MORGAN, RICHARD PEDDICORD,
RAYMOND E. CRUAL, GENE FELLIS,
DET. KESSLER, CO. BAYLARK,
RANDY SIPES, BRIAN WESTMORLAND,
and DETECTIVE GLOWCZESKI
Defendants.

CIVIL ACTION NO. 1:01-CV-1015

(Judge Kane)✓

JURY TRIAL DEMANDED

ORIGINAL
none to CC



Motion To Amend And File Supplemental Pleadings

To Motion To Compel Discovery.

AND NOW COMES, Plaintiff's, Tyrone P. James, moves this Honorable Court; In compliance with, Fed.R.Civ.P., 15(a)(b)(d), and Local Rule of Court, 15.1, to amend, the Motion To Compel Discovery, filed by this plaintiff's on December 31, 2003, while he was incarcerated in the York County Prison, and present Exhibits in support in said Motion.

Also Plaintiff's, moves this Court pursuant to Rule 34(b) and 37(a); Fed.R.Civ.P., for an order compelling the Defendants to produce for inspection and copying of the documents (1) Defendants Sipes, Crual, and Peddicord reports; the Investigation and report in relation to Defendant Sipes, and the Mail Box Ect., in California; (2) Defendant Morgan, supervisory report, and receipt of the UPS Package, shipped from California, by Defendant Sipes, and received by John Smith, State Attorney General Office Supervisor, at his office in Lemoyne, PA., on January 11, 2001; to make determination, and the use of excessive force; (2) Disciplinary actions, grievance, complaints, use of excessive force claimed, filed against all defendants, during their employment history, with the appropriate agency, showing credibility determination and behavioral pattern by the defendant. See Nelson v. Adams, USA, Inc., 529 U.S. 460, 120 S.Ct. 1579, 1584, 146 L.Ed.2d 530 (2000); Helfand v. Gerson, 105 F.3d

530, 536 (9th Cir. 1997).

Plaintiff's is entitled to recovery of expenses, including reasonably fees.

Date: January 31, 2004,

Respectfully Submitted,

Tyrone James

Tyrone P. James,

EX 9451.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

YORK COUNTY POLICE DEPARTMENT,
JAMES H. MORGAN, RICHARD PEDDICORD,
RAYMOND E. CRUAL, GENE FELLIS,
DET. KESSLER, CO. BAYLARK,
RANDY SIPES, BRIAN WESTMORLAND,
and DETECTIVE GLOWCZESKI
Defendants.

CIVIL ACTION NO. 1:01-CV-1015

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JURY TRIAL DEMANDED

VERIFICATION

I, Tyrone P. James, verify, under penalty of perjury, that the foregoing "Motion To Amend And File Supplemental Pleadings To Compel Discovery; Affidavit In Support Of Motion To Compel; Brief In Support Of Motion To Compel Discovery And Exhibits" is true and correct to the best of my knowledge and belief, pursuant to 28 U.S.C. 1746.

Respectfully Submitted,

Tyrone James

Tyrone P. James

EX 9451.

P.O. Box A
Bellefonte, PA 16823-0820

Date: January 30, 2004.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

YORK COUNTY POLICE DEPARTMENT,
JAMES H. MORGAN, RICHARD PEDDICORD,
RAYMOND E. CRJAL, GENE FELLE,
DET. KESSLER, CO. BAYLARK,
RANDY SINES, BRIAN WESTMORLAND,
and DETECTIVE GLOWCZESKI
Defendants.

CIVIL ACTION NO. 1:01-CV-1015

(Judge Kane)

JURY TRIAL DEMANDED

CERTIFICATION OF SERVICE

I, Tyrone P. James, Plaintiff's hereby certified that, I am this day serving a true and correct copy to assigned counsels, a "Motion To Amend And File Supplemental Pleadings To Compel Discovery; Affidavit In Support Of Motion To Compel; Brief In Support Of Motion To Compel Discovery And Exhibits, " in the manner set forth below to the followings:

By First Class U.S. Mail

Jason C. Giurintano
Office Of Attorney General
Civil Litigation
15 th Floor, Strawberry Square
Harrisburg, PA 17102

Donald L. Reihart
Law Office Of Donald L. Reihart
3015 Easter Avenue
York, PA 17402

Date: January 30, 2004.



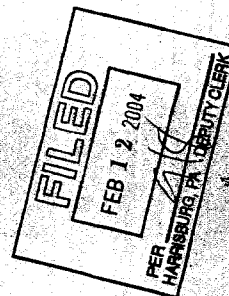
Tyrone P. James
EX 9851
P.O. Box A
Belleville, PA 16823-0820

Yone James

EX9451

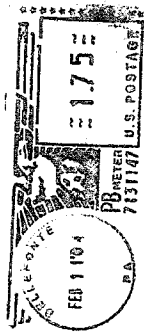
P.O. Box A

Bellefonte, PA 16823-0820



Jeanel M. [signature]

INMATE MAIL
PA DEPT OF
CORRECTIONS



Office of The Clerk
United STATES District Court
Middle District of Pennsylvania
228 Walnut Street,
P.O. Box 983
Harrisburg, PA 17108

